

Exhibit 1



August 15, 2023

Via E-mail

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Re: *In re Tether and Bitfinex Crypto Asset Litig.*, No. 19-CV-09326

Counsel:

We are in receipt of your August 8, 2023 letter, regarding deposition dates for B/T Defendants' witnesses. Plaintiffs will agree to take remote depositions via videoconference for each of the witnesses below on the condition that B/T Defendants will agree to remote depositions of the Plaintiffs. Plaintiffs agree to the following dates:

1. Paolo Ardoino: September 12 (Bitfinex Defendants 30(b)(6) deposition) and September 13 (individual).
2. Bjorn de Wolf: September 19.
3. Adam Chamely: September 22.
4. Ludovicus Jean van der Velde: September 29.

5. Giancarlo Devasini: October 5.

With respect to Stuart Hoegner, Plaintiffs are unable to attend the dates proposed by B/T Defendants (August 30, 31). Plaintiffs are available to take Mr. Hoegner's individual and 30(b)(6) depositions on any two consecutive dates between September 18–21, 2023. Please let us know which dates Mr. Hoegner is available.

Sincerely,

/s/ Andrew R. Dunlap

Andrew R. Dunlap